# PLEASE CAREFULLY REVIEW THIS OBJECTION AND THE ATTACHMENTS HERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS YOUR CLAIM(S)

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Attorneys for Debtors and Debtors in Possession

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

:

Debtors. : (Jointly Administered)

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# NOTICE OF DEBTORS' 120<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS (Multi-Debtor Claims)

PLEASE TAKE NOTICE that on December 21, 2010, Motors Liquidation

Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession

(the "Debtors"), filed their 120th omnibus objection to expunge certain claims (the "120th

Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the 120th

Omnibus Objection to Claims will be held before the Honorable Robert E. Gerber, United States

Bankruptcy Judge, in Room 621 of the United States Bankruptcy Court for the Southern District

of New York, One Bowling Green, New York, New York 10004, on February 3, 2011 at 9:45

**a.m.** (Eastern Time), or as soon thereafter as counsel may be heard.

PARTIES RECEIVING THIS NOTICE SHOULD REVIEW THE 120TH OMNIBUS OBJECTION TO CLAIMS TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN EXHIBIT "A" ANNEXED THERETO.

PLEASE TAKE FURTHER NOTICE that any responses to the 120th Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a CD-ROM or 3.5 inch disk, in text-searchable portable document format (PDF) (with a hard copy delivered directly to Chambers), in accordance with the customary practices of the Bankruptcy Court and General Order M-399, to the extent applicable, and served in accordance with General Order M-399 and on (i) Weil, Gotshal & Manges LLP, attorneys for the Debtors, 767 Fifth Avenue, New York, New York 10153 (Attn: Harvey R. Miller, Esq., Stephen Karotkin, Esq., and Joseph H. Smolinsky, Esq.); (ii) the Debtors, c/o Motors Liquidation Company, 401 South Old Woodward Avenue, Suite 370, Birmingham, Michigan 48009 (Attn: Thomas Morrow); (iii) General Motors LLC, 400 Renaissance Center, Detroit, Michigan 48265 (Attn: Lawrence S. Buonomo, Esq.); (iv) Cadwalader, Wickersham & Taft LLP, attorneys for the United States Department of the Treasury, One World Financial Center, New York, New York 10281 (Attn: John J. Rapisardi, Esq.); (v) the United States Department of the Treasury, 1500 Pennsylvania Avenue NW, Room 2312, Washington, D.C. 20220 (Attn: Joseph Samarias, Esq.); (vi) Vedder Price, P.C., attorneys for Export Development Canada, 1633 Broadway, 47th Floor, New York, New York 10019 (Attn: Michael J. Edelman, Esq. and Michael L. Schein, Esq.); (vii) Kramer Levin Naftalis & Frankel LLP, attorneys for the

statutory committee of unsecured creditors, 1177 Avenue of the Americas, New York, New York 10036 (Attn: Thomas Moers Mayer, Esq., Robert Schmidt, Esq., Lauren Macksoud, Esq., and Jennifer Sharret, Esq.); (viii) the Office of the United States Trustee for the Southern District of New York, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq.); (ix) the U.S. Attorney's Office, S.D.N.Y., 86 Chambers Street, Third Floor, New York, New York 10007 (Attn: David S. Jones, Esq. and Natalie Kuehler, Esq.); (x) Caplin & Drysdale, Chartered, attorneys for the official committee of unsecured creditors holding asbestos-related claims, 375 Park Avenue, 35th Floor, New York, New York 10152-3500 (Attn: Elihu Inselbuch, Esq. and Rita C. Tobin, Esq.) and One Thomas Circle, N.W., Suite 1100, Washington, DC 20005 (Attn: Trevor W. Swett III, Esq. and Kevin C. Maclay, Esq.); and (xi) Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, attorneys for Dean M. Trafelet in his capacity as the legal representative for future asbestos personal injury claimants, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201 (Attn: Sander L. Esserman, Esq. and Robert T. Brousseau, Esq.), so as to be received no later than **January 27, 2011 at 4:00 p.m.** (Eastern Time) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the 120th Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the 120th Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: New York, New York December 21, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

09-50026-mg Doc 8209 Filed 12/21/10 Entered 12/21/10 20:56:54 Main Document HEARING DATE AND FLORE: February 3, 2011 at 9:45 a.m. (Eastern Time)

RESPONSE DEADLINE: January 27, 2011 at 4:00 p.m. (Eastern Time)

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153

Telephone: (212) 310-8000 Facsimile: (212) 310-8007

Attorneys for Debtors and Debtors in Possession

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

:

Debtors. : (Jointly Administered)

:

#### <u>DEBTORS' 120<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS</u> (Multi-Debtor Claims)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM.

CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON THE

EXHIBIT ANNEXED TO THIS OBJECTION.

TO THE HONORABLE ROBERT E. GERBER, UNITED STATES BANKRUPTCY JUDGE:

Motors Liquidation Company (f/k/a General Motors Corporation) ("**MLC**") and its affiliated debtors, as debtors in possession (collectively, the "**Debtors**"), respectfully represent:

#### **Preliminary Statement**

1. In these chapter 11 cases, certain claimants filed multiple proofs of claim that are each identical in every aspect except for the fact they were filed against more than one of the Debtors (collectively, the "Multi-Debtor Claims"). Undoubtedly, the vast majority of the Multi-Debtor Claims were filed against multiple Debtors by claimants who were either confused as to in which case their claim should be filed, or claimants that were acting out of an abundance of caution. However, the Multi-Debtor Claims are subject to objection because, among other reasons, the Debtors' Amended Joint Chapter 11 Plan, dated December 7, 2010 (as amended from time to time, the "Plan") (ECF No. 8015), expressly provides that, upon confirmation of the Plan, joint obligations of two or more of the Debtors, and identical claims against multiple Debtors, are to be merged based on the doctrine of substantive consolidation. This means that every claimant in these cases will have but one claim against the consolidated estates of the Debtors. A hearing to consider confirmation of the Plan is currently scheduled for March 3, 2011. In recognition of the fact that claimants will be left with but one claim pursuant to substantive consolidation only if the Plan is confirmed, the Debtors seek to have the Multi-Debtor Claims expunged subject to confirmation of the Plan. This Objection is brought to expunge all of the Multi-Debtor Claims except for one claim per claimant in order to prevent an individual claimant from getting multiple recoveries on account of a single claim.

#### **Relief Requested**

2. The Debtors file this 120th omnibus objection to certain claims (the "120th Omnibus Objection to Claims"), pursuant to section 502(b) of title 11, United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), seeking entry of an order disallowing and expunging, subject to

confirmation of the Plan, the Multi-Debtor Claims listed on **Exhibit** "**A**," annexed hereto, under the heading "*Claims to be Disallowed and Expunged*."

3. The Debtors have determined that each of the Multi-Debtor Claims is duplicative of and otherwise identical to one or more proofs of claim filed by the same claimant against another Debtor in these chapter 11 cases. As the Debtors' Plan provides for the substantive consolidation of the Debtors' estates, duplicative claims against two or more of the Debtors by the same claimant will be merged into a single surviving claim against the consolidated estates of the Debtors. As such, the Debtors request that, subject to the confirmation of the Plan, the Multi-Debtor Claims be expunged and disallowed in their entirety, such that, claimants will only have a single surviving claim against the consolidated Debtors as provided for on Exhibit "A" under the heading "Surviving Claims" (the "Surviving Claims").

#### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

#### **Background**

5. On June 1, 2009, four of the Debtors (the "**Initial Debtors**")<sup>2</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, and on October 9,

Creditors can obtain copies of the cover page of any proof of claim filed against the Debtors' bankruptcy estates on the Debtors' claims register on the website maintained by the Debtors' claims agent, <a href="https://www.motorsliquidation.com">www.motorsliquidation.com</a>. A link to the claims register is located under the "Claims Information" tab. Creditors without access to the Internet may request a copy of the cover page of any proof of claim by mail to The Garden City Group, Inc., Motors Liquidation Company Claims Agent, P.O. Box 9386, Dublin, Ohio 43017-4286 or by calling The Garden City Group, Inc. at 1-703-286-6401.

The Initial Debtors are Motors Liquidation Company (f/k/a General Motors Corporation), MLCS, LLC (f/k/a Saturn, LLC), MLCS Distribution Corporation (f/k/a Saturn Distribution Corporation), and MLC of Harlem, Inc. (f/k/a Chevrolet-Saturn of Harlem, Inc.).

2009, two additional Debtors (the "**REALM/ENCORE Debtors**")<sup>3</sup> commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code, which cases are jointly administered with those of the Initial Debtors under Case Number 09-50026 (REG). On September 15, 2009, the Initial Debtors filed their schedules of assets and liabilities and statements of financial affairs, which were amended on October 4, 2009. On October 15, 2009, the REALM/ENCORE Debtors filed their schedules of assets and liabilities and statements of financial affairs.

November 30, 2009 as the deadline for each person or entity to file a proof of claim in the Initial Debtors' cases, including governmental units (the "Initial Debtors Bar Date Order") (ECF No. 4079). On December 2, 2009, this Court entered an order establishing February 1, 2010 as the deadline for each person or entity to file a proof of claim in the REALM/ENCORE Debtors' cases (except governmental units, as defined in section 101(27) of the Bankruptcy Code, for which the Court established April 16, 2010 as the deadline) (the "REALM/ENCORE Bar Date Order") (ECF No. 4586). On December 18, 2009, this Court entered an order establishing February 10, 2010 as the deadline for entities residing adjacent to or in the proximity of certain material manufacturing properties of the Debtors to file a proof of claim with respect to such properties (the "Property Bar Date Order," ECF No. 4681, and collectively with the Initial Debtors Bar Date Order, the REALM/ENCORE Bar Date Order, and the Property Bar Date Order, the "Bar Date Orders").

The REALM/ENCORE Debtors are Remediation and Liability Management Company, Inc., and Environmental Corporate Remediation Company, Inc.

7. On August 30, 2010, the Debtors filed their Joint Chapter 11 Plan, which was amended on December 7, 2010.<sup>4</sup> Section 6.1 of the Plan, entitled "Substantive Consolidation," provides in pertinent part that:

Entry of the Confirmation Order shall constitute the approval, pursuant to section 105(a) of the Bankruptcy Code, effective as of the Effective Date, of the substantive consolidation of MLC of Harlem, Inc.; MLCS, LLC; MLCS Distribution Corporation; Remediation and Liability Management Company, Inc.; and Environmental Corporate Remediation Company, Inc., and their respective estates, into MLC for voting, confirmation, and distribution purposes under the Plan. Solely for such purposes, on and after the Effective Date, (i) all assets and all liabilities of the Debtors shall be deemed merged into MLC, (ii) all guaranties of any Debtor of the payment, performance, or collection of obligations of another Debtor shall be eliminated and cancelled, (iii) any obligation of any Debtor and all guaranties thereof executed by one or more of the other Debtors shall be treated as a single obligation, and such guaranties shall be deemed a single Claim against the consolidated Debtors, (iv) all joint obligations of two or more Debtors and all multiple Claims against such entities on account of such joint obligations shall be treated and allowed only as a single Claim against the consolidated Debtors, (v) all Claims between or among the Debtors shall be cancelled, and (vi) each Claim filed in the Chapter 11 Case of any Debtor shall be deemed filed against the consolidated Debtors and a single obligation of the consolidated Debtors on and after the Effective Date.

#### The Relief Requested Should Be Approved by the Court

8. A filed proof of claim is "deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). If an objection refuting at least one of the claim's essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc'ns Corp.*, No. 02-41729, 2007 Bankr. LEXIS 660, at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000). Section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed to the extent that

<sup>&</sup>lt;sup>4</sup> A hearing to consider confirmation of the Plan has been scheduled for March 3, 2011.

"such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law." 11 U.S.C. § 502(b)(1).

9. Each of the Multi-Debtor Claims is identical to and duplicative of one or more claims filed by the same claimant against another Debtor in these chapter 11 cases. Due to the fact that the Plan provides for the substantive consolidation of the Debtors' estates, upon the confirmation of the Plan and the occurrence of the Effective Date (as defined in the Plan), each of the Multi-Debtor Claims will be unenforceable for the reason that, under the Plan, joint liabilities of two or more of the Debtors, and all multiple claims against them, will be allowed only as a single claim against the consolidated Debtors. As such, claimants holding Multi-Debtor Claims will not be prejudiced if the relief requested herein is granted because such relief is subject to the confirmation of the Plan, the occurrence of which would itself ultimately result in the Multi-Debtor Claims effectively being disallowed and expunged.

#### **Reservation of Rights**

- 10. The Debtors reserve the right to later object to any of the Surviving Claims on the basis that its holder failed to timely file a proof of such claim against at least one Debtor with respect to which the Surviving Claim would have been enforceable, by the applicable deadline set forth in the Bar Date Orders.
- 11. Additionally, the Debtors reserve the right to object to any of the Multi-Debtor Claims which are not disallowed and expunged in their entirety for any reason.

#### **Notice**

12. Notice of this 120th Omnibus Objection to Claims has been provided to each claimant listed on Exhibit A and parties in interest in accordance with the Fourth Amended Order Pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing

Notice and Case Management Procedures, dated August 24, 2010 (ECF No. 6750). The Debtors submit that such notice is sufficient and no other or further notice need be provided.

13. No previous request for the relief sought herein has been made by the Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as is just.

Dated: New York, New York December 21, 2010

/s/ Joseph H. Smolinsky

Harvey R. Miller Stephen Karotkin Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP 767 Fifth Avenue New York, New York 10153 Telephone: (212) 310-8000

Attorneys for Debtors and Debtors in Possession

Facsimile: (212) 310-8007

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Exhibit A

CLAIM	IS TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds Fo		Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
AUDITOR OF STATE	3113	MLC of Harlem, Inc.	\$0.00 (5	debtor	Pgs. 1-4	AUDITOR OF STATE	3115	Motors Liquidation	\$0.00 (\$	
ANGLARGE PROPERTY PROGRAM			\$0.00 (A	A) Duplicate Claim	•	UNICLA HATER PROPERTY PRAIGION		Company	\$0.00 (A	
UNCLAIMED PROPERTY DIVISION PO BOX 251906			\$0.00 (I			UNCLAIMED PROPERTY DIVISION PO BOX 251906			\$0.00 (1	
LITTLE ROCK, AR 72225			\$0.00 (U	J)		LITTLE ROCK, AR 72225			\$0.00 (U	
Official Claim Date 10/5/2009			(7	Γ)		Official Claim Date 10/5/2009			(7	
AUDITOR OF STATE	3114	MLCS	\$0.00 (\$	S) Multi-	Pgs. 1-4	AUDITOR OF STATE	3115	Motors	\$0.00 (\$	
	211.	Distribution		debtor	Ü		5115	Liquidation		
UNCLAIMED PROPERTY DIVISION PO BOX 251906		Corporation	\$0.00 (A \$0.00 (I	Claim	2	UNCLAIMED PROPERTY DIVISION PO BOX 251906		Company	\$0.00 (A \$0.00 (I	
LITTLE ROCK, AR 72225			\$0.00 (U			LITTLE ROCK, AR 72225			\$0.00 (U	
Official Claim Date 10/5/2009			(7	Γ)		Official Claim Date 10/5/2009			(**	
AUDITOR OF STATE	3116	MLCS, LLC	\$0.00 (\$		Pgs. 1-4	AUDITOR OF STATE	3115	Motors Liquidation	\$0.00 (\$	
			\$0.00 (A		e			Company	\$0.00 (A	
UNCLAIMED PROPERTY DIVISION PO BOX 251906			\$0.00 (I	Claim P)		UNCLAIMED PROPERTY DIVISION PO BOX 251906			\$0.00 (I	
LITTLE ROCK, AR 72225			\$0.00 (U	J)		LITTLE ROCK, AR 72225			\$0.00 (U	
Official Claim Date 10/5/2009			(7)	Γ)		Official Claim Date 10/5/2009			(7	

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS	O DE DISA	ALLOWED AND	EALUNGED		SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds F Objectio	•	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
BASF CORPORATION	69935	Environmental Corporate Remediation Company, Inc.	\$0.00 (£	debtor	te	BASF CORPORATION	69934	Remediation And Liability Management Company, Inc.	\$0.00 (S \$0.00 (A
C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ		1 3,	\$0.00 (I \$4,800,000.00 (U	P)		C/O BRESSLER AMERY & ROSS PC ATTN DAVID P SCHNEIDER ESQ			\$0.00 (I \$4,800,000.00 (U
PO BOX 1980 MORRISTOWN, NJ 07962			\$4,800,000.00			PO BOX 1980 MORRISTOWN, NJ 07962			\$4,800,000.00 (7
Official Claim Date 2/1/2010						Official Claim Date 2/1/2010			
BORGWARNER INC	69945	Environmental	\$0.00 (	,	0	BORG WARNER INC	67827	Motors	\$0.00 (\$
		Corporate Remediation Company, Inc.	\$0.00 (A	debtor A) Duplica Claim	te			Liquidation Company	\$0.00 (A
C/O WILLIAMS MONTGOMERY & JOHN LTD ATTN THOMAS D LUPO		2 2	\$0.00 (1	,		THOMAS D LUPO WILLIAMS MONTGOMERY & JOHN LTD			\$0.00 (I
233 S WACKER DRIVE SUITE 6100 CHICAGO, IL 60606			\$0.00 (U	,		233 SOUTH WACKER DRIVE STE 6100 CHICAGO, IL 60606			\$0.00 (U
Official Claim Date 2/1/2010						Official Claim Date 12/1/2009			
BORGWARNER INC	69946	Remediation And Liability	\$0.00 (	S) Multi- debtor		BORG WARNER INC	67827	Motors Liquidation	\$0.00 (5
		Management Company, Inc.	\$0.00 (A	Claim				Company	\$0.00 (A
C/O WILLIAMS MONTGOMERY & JOHN LTD ATTN THOMAS D LUPO			\$0.00 (I \$0.00 (U			THOMAS D LUPO WILLIAMS MONTGOMERY & JOHN LTD			\$0.00 (I \$0.00 (U
233 S WACKER DRIVE SUITE 6100 CHICAGO, IL 60606			(7	,		233 SOUTH WACKER DRIVE STE 6100 CHICAGO, IL 60606			(7)
Official Claim Date 2/1/2010						Official Claim Date 12/1/2009			

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIM	IS TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
CITY OF DAYTON	69947	Remediation And Liability Management Company, Inc.	\$0.00 (S) \$0.00 (A)	debtor	Pgs. 1-4	CITY OF DAYTON	59002	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)	
C/O SQUIRE SANDERS & DEMPSEY		Company, me.	\$0.00 (P)			ELLIOT M SMITH, ESQ			\$0.00 (P)	
ATTN ELLIOT M SMITH ESQ 221 E 4TH STREET SUITE 2900			\$0.00 (U)	)		SQUIRE, SANDERS & DEMPSEY 221 E 4TH ST SUITE 2900			\$0.00 (U)	
CINCINNATI, OH 45202			(T)	)		CINCINNATI, OH 45202			(T)	
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009				
CITY OF DAYTON	69948	Environmental Corporate	\$0.00 (S)	) Multi- debtor	Pgs. 1-4	CITY OF DAYTON	59002	Motors Liquidation	\$0.00 (S)	
		Remediation	\$0.00 (A)					Company	\$0.00 (A)	
C/O SQUIRE SANDERS & DEMPSEY		Company, Inc.	\$0.00 (P)			ELLIOT M SMITH, ESQ			\$0.00 (P)	
ATTN ELLIOT M SMITH ESQ 221 E 4TH STREET SUITE 2900			\$0.00 (U)	)		SQUIRE, SANDERS & DEMPSEY 221 E 4TH ST SUITE 2900			\$0.00 (U)	
CINCINNATI, OH 45202			(T)	)		CINCINNATI, OH 45202			(T)	
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIN	AS TO BE DISA	ALLOWED AND	EXPUNGED		SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds I	•	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
COLONIAL PIPELINE COMPANY	69896	Remediation And Liability	\$0.00 (\$	) Multi	U	COLONIAL PIPELINE COMPANY	66208	Motors Liquidation	\$0.00 (\$
		Management Company, Inc.	\$0.00 (A		ate			Company	\$0.00 (A
OFFICE OF GENERAL COUNSEL 1185 SANCTUARY PARKWAY			\$0.00 (F			GENERAL COUNSEL'S OFFICE 1185 SANCTUARY PARKWAY, SUITE 100			\$0.00 (I
ALPHARETTA, GA 30009			\$4,800,000.00 (U	)		ALPHARETTA, GA 30009			\$4,800,000.00 (U
			\$4,800,000.00 (7	)					\$4,800,000.00 (7
Official Claim Date 2/1/2010						Official Claim Date 11/30/2009			
COLONIAL PIPELINE COMPANY	69929	Environmental	\$0.00 (S			COLONIAL PIPELINE COMPANY	66208	Motors	\$0.00 (\$
		Corporate Remediation	\$0.00 (A	debto ) Duplica				Liquidation Company	\$0.00 (A
DENGE OF GENERAL GOVERNMEN		Company, Inc.	\$0.00 (F	Claim	n	GENERAL COUNSEL'S OFFICE			\$0.00 (1
OFFICE OF GENERAL COUNSEL 1185 SANCTUARY PARKWAY						1185 SANCTUARY PARKWAY, SUITE 100			
ALPHARETTA, GA 30009			\$4,800,000.00 (U	)		ALPHARETTA, GA 30009			\$4,800,000.00 (1
			\$4,800,000.00 (7	)					\$4,800,000.00
Official Claim Date 2/1/2010						Official Claim Date 11/30/2009			
DANA HOLDING CORPORATION	65897	MLCS	\$0.00 (S	) Multi	- Pgs. 1-4	DANA HOLDING CORPORATION AND ITS	65896	Motors	\$0.00 (\$
		Distribution Corporation	\$0.00 (A	debto ) Duplica		SUBSIDIARIES AND AFFILIATES		Liquidation Company	\$0.00 (A
ATTN LISA WURSTER 8939 TECHNOLOGY DRIVE		Corporation	\$0.00 (F	Clair		ATTN LISA WURSTER 3939 TECHNOLOGY DRIVE		Company	\$0.00 (F
MAUMEE, OH 43537			\$10,034.72 (U	)		MAUMEE, OH 43537			\$10,034.72 (U
Official Claim Date 11/23/2009			\$10,034.72 (T	)		Official Claim Date 11/23/2009			\$10,034.72 (

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS '	TO BE DISA	LLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds Fo Objection	r Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
DANA HOLDING CORPORATION AND ITS SUBSIDIARIES AND AFFILIATES	65895	MLCS, LLC	\$0.00 (3	S) Multi- debtor	Pgs. 1-4	DANA HOLDING CORPORATION AND ITS SUBSIDIARIES AND AFFILIATES	65896	Motors Liquidation	\$0.00 (S)	
			\$0.00 (A	, .				Company	\$0.00 (A)	
ATTN LISA WURSTER 939 TECHNOLOGY DR			\$0.00 (	Claim P)		ATTN LISA WURSTER 3939 TECHNOLOGY DRIVE			\$0.00 (P)	
MAUMEE, OH 43537			\$10,034.72 (U	J)		MAUMEE, OH 43537			\$10,034.72 (U)	
Official Claim Date 11/23/2009			\$10,034.72	Γ)		Official Claim Date 11/23/2009			\$10,034.72 (T)	

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

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Exhibit A

CLAIMS TO	BE DISA	ALLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount an Priority (1)	nd (	Grounds For O Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
EDGEWATER SITE ADMINISTRATIVE GROUP	58620	MLCS Distribution	\$0.00	` ′	Multi- debtor	Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors Liquidation	\$0.00 (	
ATTN PAUL G MCCUSKER		Corporation	\$0.00	` ′	Duplicate Claim		ATTN PAUL G MCCUSKER ESQ		Company	\$0.00 (	
C/O MCCUSKER ANSELMI ROSEN AND CARVELL 210 PARK AVENUE SUITE 301	I		\$0.00 \$4,800,000.00	` ′			C/O MCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301			\$0.00 ( \$4,800,000.00 (	
PO BOX 240 FLORHAM PARK, NY 07932			\$4,800,000.00				PO BOX 240 FLORHAM PARK, NJ 07932			\$4,800,000.00 (	
Official Claim Date 11/27/2009			\$ <del>4</del> ,500,000.00	(1)			Official Claim Date 11/27/2009			\$ <del>4</del> ,800,000.00 (	
- 112/12/09							onical campact 1727/2007				
EDGEWATER SITE ADMINISTRATIVE GROUP	58622	MLCS, LLC	\$0.00	(S)	Multi- debtor	Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors Liquidation	\$0.00 (	
			\$0.00	(A)	Duplicate Claim				Company	\$0.00 (	
ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELMI ROSEN & CARVELLI			\$0.00	(P)	Ciaiiii		ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI			\$0.00 (	
210 PARK AVENUE SUITE 301 PO BOX 240			\$4,800,000.00	(U)			210 PARK AVENUE SUITE 301 PO BOX 240			\$4,800,000.00	
FLORHAM PARK, NJ 07932 UNITED STATES OF AMERICA			\$4,800,000.00	(T)			FLORHAM PARK, NJ 07932			\$4,800,000.00 (	
Official Claim Date 11/27/2009							Official Claim Date 11/27/2009				
EDGEWATER SITE ADMINISTRATIVE GROUP	58623	MLC of Harlem,	\$0.00	(S)	Multi-	Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors	\$0.00 (	
		Inc.	\$0.00	(A)	debtor Duplicate				Liquidation Company	\$0.00 (	
PAUL G MCCUSKER ESQ MCCUSKER ANSELMI ROSEN & CARVELLI			\$0.00	(P)	Claim		ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI			\$0.00 (	
210 PARK AVENUE SUITE 301 PO BOX 240			\$4,800,000.00	(U)			210 PARK AVENUE SUITE 301 PO BOX 240			\$4,800,000.00	
FLORHAM PARK, NJ 07932 UNITED STATES OF AMERICA			\$4,800,000.00	(T)			FLORHAM PARK, NJ 07932			\$4,800,000.00 (	
Official Claim Date 11/27/2009							Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

BE DISA	LLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Claim#	Debtor	Claim Amount and Priority (1)	nd G			Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
69943	Environmental	\$0.00	(S)		Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors	\$0.00 (	
	Remediation	\$0.00 (	(A)	Duplicate				Company	\$0.00 (A	
2	Company, Inc.	\$0.00	(P)	Claim		ATTN PAUL G MCCUSKER ESQ			\$0.00 (	
		\$4,800,000.00 (	(U)			210 PARK AVENUE SUITE 301			\$4,800,000.00 (U	
		\$4,800,000.00	(T)			FLORHAM PARK, NJ 07932			\$4,800,000.00	
						Official Claim Date 11/27/2009				
69944	Remediation And	\$0.00	(S)	Multi-	Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors	\$0.00 (	
69944	Liability Management	\$0.00 \$0.00 (	` ′	debtor Duplicate	Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP	58621	Motors Liquidation Company	\$0.00 (£	
69944	Liability		(A)	debtor	Pgs. 1-4	EDGEWATER SITE ADMINISTRATIVE GROUP  ATTN PAUL G MCCUSKER ESQ	58621	Liquidation	, , , , ,	
	Liability Management	\$0.00 (	(A) (P)	debtor Duplicate	Pgs. 1-4	ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301	58621	Liquidation	\$0.00 (A	
	Liability Management	\$0.00 ( \$0.00	(A) (P) (U)	debtor Duplicate	Pgs. 1-4	ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI	58621	Liquidation	\$0.00 (A \$0.00 (I	
	69943	69943 Environmental Corporate Remediation Company, Inc.	69943 Environmental Corporate Remediation Company, Inc. \$0.00	69943 Environmental \$0.00 (S)  Corporate Remediation \$0.00 (A) Company, Inc.	69943 Environmental Corporate Remediation Company, Inc. \$4,800,000.00 (U)	69943 Environmental Corporate Remediation Company, Inc.  \$4,800,000.00 (U)    Priority (1)   Objection   Reference	69943 Environmental Corporate Remediation Company, Inc.  \$0.00 (S) Multi-debtor Duplicate Claim \$0.00 (P) ATTN PAUL G MCCUSKER ESQ C/O MCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	69943 Environmental Corporate Remediation Company, Inc.  \$0.00 (A) Duplicate Claim \$0.00 (B) Multidebtor Duplicate Claim \$0.00 (C) State Claim \$0.00 (C) S	69943 Environmental Corporate Remediation Company, Inc.  \$0.00 (A) Duplicate Claim  \$0.00 (B) ATTN PAUL G MCCUSKER ESQ COMMCCUSKER ANSELM ROSEN AND CARVELLI 210 PARK AVENUE SUITE 301 PO BOX 240 FLORHAM PARK, NJ 07932	

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIN	IS TO BE DISA	LLOWED AND	EXPUNGED		SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
EXIDE TECHNOLOGIES	44830	MLCS, LLC	\$0.00 (S)	debtor	Pgs. 1-4	EXIDE TECHNOLOGIES	44829	Motors Liquidation	\$0.00 (S)
C/O NATHAN HARWELL			\$0.00 (A)	) Duplicate Claim		C/O NATHAN HARWELL		Company	\$0.00 (A)
13000 DEERFIELD PKWY STE 200			\$0.00 (P)			13000 DEERFIELD PKWY STE 200			\$0.00 (P)
MILTON, GA 30004			\$0.00 (U	)		MILTON, GA 30004			\$0.00 (U)
Official Claim Date 11/24/2009			(T <sub>i</sub>	)		Official Claim Date 11/24/2009			(T)
EXIDE TECHNOLOGIES	44831	MLC of Harlem,	\$0.00 (S	) Multi-	Pgs. 1-4	EXIDE TECHNOLOGIES	44829	Motors	\$0.00 (S)
EAIDE TECHNOLOGIES	44031	Inc.		debtor	1 gs. 1-4	EADE TECHNOLOGIES	44029	Liquidation	,
C/O NATHAN HARWELL			\$0.00 (A)	) Duplicate Claim		C/O NATHAN HARWELL		Company	\$0.00 (A)
13000 DEERFIELD PKWY STE 200			\$0.00 (P)	)		13000 DEERFIELD PKWY STE 200			\$0.00 (P)
MILTON, GA 30004			\$0.00 (U	)		MILTON, GA 30004			\$0.00 (U)
Official Claim Date 11/24/2009			(T	)		Official Claim Date 11/24/2009			(T)
EXIDE TECHNOLOGIES	44832	MLCS Distribution	\$0.00 (S)	) Multi- debtor	Pgs. 1-4	EXIDE TECHNOLOGIES	44829	Motors Liquidation	\$0.00 (S)
		Corporation	\$0.00 (A)	) Duplicate				Company	\$0.00 (A)
C/O NATHAN HARWELL 13000 DEERFIELD PKWY STE 200			\$0.00 (P)	Claim )		C/O NATHAN HARWELL 13000 DEERFIELD PKWY STE 200			\$0.00 (P)
MILTON, GA 30004 UNITED STATES OF AMERICA			\$0.00 (U	)		MILTON, GA 30004			\$0.00 (U)
			(T)	)					(T)
Official Claim Date 11/24/2009						Official Claim Date 11/24/2009			

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIMS TO	BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Ground Object	ds For Objection Page ction Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
EXXON MOBIL CORPORATION	59634	MLC of Harlem, Inc.	\$0.00 (\$	del	ulti- Pgs. 1-4 btor	EXXON MOBIL CORPORATION	59637	Motors Liquidation	\$0.00 (\$	
ANDREW E ANSELMI ESQ			\$0.00 (A	Cl	licate laim	ANDREW E ANSELMI ESQ		Company	\$0.00 (A	
MCCUSKER ANSELMI ROSEN & CARVELLI PC 210 PARK AVENUE SUITE 301			\$0.00 (I	,		MCCUSKER ANSELMI ROSEN AND CARVELLI PC 210 PARK AVENUE STE 301			\$0.00 (I	
PO BOX 240			\$20,000,000.00 (U	J)		PO BOX 240			\$20,000,000.00 (U	
FLORHAM PARK, NJ 07932			\$20,000,000.00 (7	Γ)		FLORHAM PARK, NJ 07932			\$20,000,000.00 (7	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				
EXXON MOBIL CORPORATION	59635	MLCS	\$0.00 (\$	,	ulti- Pgs. 1-4	EXXON MOBIL CORPORATION	59637	Motors	\$0.00 (\$	
		Distribution Corporation	\$0.00 (A		btor licate			Liquidation Company	\$0.00 (A	
ANDREW E ANSELMI ESQ		•	\$0.00 (I		laim	ANDREW E ANSELMI ESQ			\$0.00 (1	
MCCUSKER ANSELMI ROSEN & CARVELLI P C 210 PARK AVENUE SUITE 301						MCCUSKER ANSELMI ROSEN AND CARVELLI PC 210 PARK AVENUE STE 301				
PO BOX 240 FLORHAM PARK, NJ 07932			\$20,000,000.00 (U	J <b>)</b>		PO BOX 240 FLORHAM PARK, NJ 07932			\$20,000,000.00 (1	
FLORHAM PARK, NJ 07932			\$20,000,000.00 (7	Γ)		FLORHAM FARK, NJ 0/952			\$20,000,000.00 (7	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				
EXXON MOBIL CORPORATION	59636	MLCS, LLC	\$0.00 (S	2) M	ulti- Pgs. 1-4	EXXON MOBIL CORPORATION	59637	Motors	\$0.00 (\$	
EAZON MOBIL CORPORATION	39030	MLCS, LLC		del	btor	EAAON MOBIL CORPORATION	39037	Liquidation	, , , , , ,	
ANDREW E ANSELMI ESQ			\$0.00 (A	, .	licate laim	ANDREW E ANSELMI ESQ		Company	\$0.00 (A	
MCCUSKER ANSELMI ROSEN AND CARVELLI PC 210 PARK AVENUE SUITE 301	!		\$0.00 (I	?)		MCCUSKER ANSELMI ROSEN AND CARVELLI PC 210 PARK AVENUE STE 301			\$0.00 (I	
PO BOX 240			\$20,000,000.00 (U	J)		PO BOX 240			\$20,000,000.00 (U	
FLORHAM PARK, NY 07932			\$20,000,000.00 (7	Γ)		FLORHAM PARK, NJ 07932			\$20,000,000.00 (7	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIMS T	O BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds Fo	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
EXXON MOBIL CORPORATION	59854	MLC of Harlem, Inc.	\$0.00 (S	debtor	Pgs. 1-4	EXXON MOBIL CORPORATION	59857	Motors Liquidation	\$0.00 (S	
C/O PAUL G MCCUSKER ESQ			\$0.00 (A	Claim		ATTN PAUL G MCCUSKER ESQ		Company	\$0.00 (A	
MCCUSKER ANSELMI ROSEN AND CARVELLI 210 PARK AVENUE STE 301			\$0.00 (F			MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301			\$0.00 (F	
PO BOX 240			\$4,800,000.00 (U	)		PO BOX 240			\$4,800,000.00 (U	
FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	")		FLORHAM PARK, NJ 07932			\$4,800,000.00 (1	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				
EXXON MOBIL CORPORATION	59855	MLCS	\$0.00 (S	,	Pgs. 1-4	EXXON MOBIL CORPORATION	59857	Motors	\$0.00 (S	
		Distribution Corporation	\$0.00 (A	debtor  Duplicate				Liquidation Company	\$0.00 (A	
C/O PAUL G MCCUSKER ESQ		•	\$0.00 (F	Claim	n	ATTN PAUL G MCCUSKER ESQ			\$0.00 (1	
MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301				,		MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301				
PO BOX 240			\$4,800,000.00 (U	()		PO BOX 240			\$4,800,000.00 (U	
FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	")		FLORHAM PARK, NJ 07932			\$4,800,000.00 (7	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				
			40.00						***	
EXXON MOBIL CORPORATION	59856	MLCS, LLC	\$0.00 (S	Multi- debtor	Pgs. 1-4	EXXON MOBIL CORPORATION	59857	Motors Liquidation	\$0.00 (S	
ATTN DATH C MCCUSVED ESO			\$0.00 (A	Duplicate Claim		ATTN DALIL C MOCUEVED ESO		Company	\$0.00 (A	
ATTN PAUL G MCCUSKER ESQ MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301			\$0.00 (F			ATTN PAUL G MCCUSKER ESQ MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301			\$0.00 (I	
PO BOX 240			\$4,800,000.00 (U	<b>)</b>		PO BOX 240			\$4,800,000.00 (U	
FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	")		FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIMS	TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
EXXON MOBIL CORPORATION	69949	Environmental Corporate Remediation	\$0.00 (S) \$0.00 (A)	debtor	Pgs. 1-4	EXXON MOBIL CORPORATION	59857	Motors Liquidation Company	\$0.00 (S \$0.00 (A	
C/O MCCUSKER ANSELMI ROSEN & CARVELI	LI PC	Company, Inc.	\$0.00 (P)			ATTN PAUL G MCCUSKER ESQ			\$0.00 (P	
ATTN PAUL G MCCUSKER ESQ 210 PARK AVENUE SUITE 301 PO BOX 240			\$4,800,000.00 (U	)		MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301 PO BOX 240			\$4,800,000.00 (U	
FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	)		FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009				
EXXON MOBIL CORPORATION	69950	Remediation And	\$0.00 (S		Pgs. 1-4	EXXON MOBIL CORPORATION	59857	Motors	\$0.00 (S	
		Liability Management	\$0.00 (A)					Liquidation Company	\$0.00 (A	
C/O MCCUSKER ANSELMI ROSEN & CARVELI	LI PC	Company, Inc.	\$0.00 (P)	Claim )		ATTN PAUL G MCCUSKER ESQ			\$0.00 (P	
ATTN PAUL G MCCUSKER ESQ 210 PARK AVENUE SUITE 301			\$4,800,000.00 (U	)		MCCUSKER ANSELMI ROSEN & CARVELLI 210 PARK AVENUE STE 301			\$4,800,000.00 (U	
PO BOX 240 FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	)		PO BOX 240 FLORHAM PARK, NJ 07932			\$4,800,000.00 (T	
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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120th Omnibus Objection

CLAIMS T	TO BE DISA	ALLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		rounds For ( Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
GENERAL DYNAMICS LAND SYSTEMS INC	69920	Environmental	\$0.00	(S)	Multi-	Pgs. 1-4	GENERAL DYNAMICS LAND SYSTEMS INC	44294	Motors	\$0.00 (S)	
		Corporate Remediation Company, Inc.	\$0.00 (	(A)	debtor Duplicate Claim				Liquidation Company	\$0.00 (A)	
C/O MCCARTER & ENGLISH LLP		Company, mc.	\$0.00	(P)	Ciaiiii		MCCARTER & ENGLISH LLP ATTN ROBERT J HO	ELSCHER		\$0.00 (P)	
ATTN ROBERT J HOELSCHER PARTNER 1735 MARKET ST SUITE 700			\$4,800,000.00 (	(U)			PARTNER 1735 MARKET STREET SUITE 700			\$4,800,000.00 (U)	
PHILADELPHIA, PA 19103			\$4,800,000.00 (	(T)			PHILADELPHIA, PA 19103 UNITED STATES OF AMERICA			\$4,800,000.00 (T)	
Official Claim Date 1/29/2010							Official Claim Date 11/24/2009				
GENERAL DYNAMICS LAND SYSTEMS INC	69921	Remediation And	\$0.00	(S)	Multi-	Pgs. 1-4	GENERAL DYNAMICS LAND SYSTEMS INC	44294	Motors	\$0.00 (S)	
	0,,21	Liability Management	\$0.00 (	. /	debtor Duplicate	180.1			Liquidation Company	\$0.00 (A)	
		Company, Inc.	\$0.00 (	(A)	Claim				Company		
C/O MCCARTER & ENGLISH LLP ATTN ROBERT J HOELSCHER PARTNER			\$0.00 (	(P)			MCCARTER & ENGLISH LLP ATTN ROBERT J HO PARTNER	ELSCHER		\$0.00 (P)	
1735 MARKET STREET SUITE 700			\$4,800,000.00 (	(U)			1735 MARKET STREET SUITE 700			\$4,800,000.00 (U)	
PHILADELPHIA, PA 19103			\$4,800,000.00 (	(T)			PHILADELPHIA, PA 19103 UNITED STATES OF AMERICA			\$4,800,000.00 (T)	
Official Claim Date 1/29/2010							Official Claim Date 11/24/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS	S TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
HADEN SCHWEITZER CORPORATION	51352	MLC of Harlem, Inc.	\$0.00 (X	debtor	Pgs. 1-4	HADEN SCHWEITZER CORPORATION	51355	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)	
C/O MICHAEL G MENKOWITZ ESQUIRE FOX ROTHSCHILD LLP			\$0.00 (1	Claim		C/O MICHAEL G MENKOWITZ ESQUIRE FOX ROTHSCHILD LLP		Сотрану	\$0.00 (P)	
2000 MARKET STREET 10TH FLOOR PHILADELPHIA, PA 19103			\$254,511.34 (U	J)		2000 MARKET STREET 10TH FLOOR PHILADELPHIA, PA 19103			\$254,511.34 (U)	
Official Claim Date 11/25/2009			\$254,511.34 (	Γ)		Official Claim Date 11/25/2009			\$254,511.34 (T)	
HADEN SCHWEITZER CORPORATION  C/O MICHAEL G MENKOWITZ ESQUIRE FOX ROTHSCHILD LLP 2000 MARKET STREET 10TH FLOOR PHILADELPHIA, PA 19103  Official Claim Date 11/25/2009	51353	MLCS Distribution Corporation	\$0.00 (2 \$0.00 (2 \$0.00 (1 \$254,511.34 (1 \$254,511.34 (1	debtor Duplicate Claim P)	Pgs. 1-4	HADEN SCHWEITZER CORPORATION  C/O MICHAEL G MENKOWITZ ESQUIRE FOX ROTHSCHILD LLP 2000 MARKET STREET 10TH FLOOR PHILADELPHIA, PA 19103  Official Claim Date 11/25/2009	51355	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$254,511.34 (U) \$254,511.34 (T)	
HADEN SCHWEITZER CORPORATION  C/O MICHAEL G MENKOWITZ ESQUIRE FOX ROTHSCHILD LLP 2000 MARKET STREET 10TH FLOOR PHILADELPHIA, PA 19103  Official Claim Date 11/25/2009	51354	MLCS, LLC	\$0.00 (2 \$0.00 (2 \$0.00 (1 \$254,511.34 (1 \$254,511.34 (1	debtor Duplicate Claim P)	Pgs. 1-4	HADEN SCHWEITZER CORPORATION  C/O MICHAEL G MENKOWITZ ESQUIRE FOX ROTHSCHILD LLP 2000 MARKET STREET 10TH FLOOR PHILADELPHIA, PA 19103  Official Claim Date 11/25/2009	51355	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$254,511.34 (U) \$254,511.34 (T)	

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIMS	TO BE DISA	ALLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)			tion Page ference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
HONEYWELL INTERNATIONAL INC.	69981	Remediation And Liability Management Company, Inc.	\$0.00 ( \$0.00 (A	,	Multi- P debtor Duplicate Claim	gs. 1-4	HONEYWELL INTERNATIONAL INC.	45832	Motors Liquidation Company	\$0.00 (£	
ATTN: THOMAS BYRNE CHIEF ENVIRONMENTAL COUNSEL 101 COLUMBIA ROAD			\$0.00 ( \$34,500,000.00 (				ATTN THOMAS BYRNE, CHIEF ENVIRONMENTA 101 COLUMBIA ROAD	L COUNSEL		\$0.00 (I \$34,500,000.00 (I	
MORRISTOWN, NJ 07962 UNITED STATES OF AMERICA			\$34,500,000.00 (	T)			MORRISTOWN, NJ 07962 UNITED STATES OF AMERICA			\$34,500,000.00 (7	
Official Claim Date 2/1/2010							Official Claim Date 11/25/2009				
JAMES A CRAMER AS PERSONAL REP OF ESTATE OR JOHN E CRAMER	6335	MLC of Harlem,	\$0.00 (	(S)	Multi- P	gs. 1-4	JAMES A CRAMER AS PERSONAL REP OF ESTATE OF JOHN E CRAMER	6337	Motors Liquidation	\$0.00 (\$	
		me.	\$0.00 (	A) I	Duplicate Claim				Company	\$0.00 (A	
ATTN ROBERT M N PALMER THE LAW OFFICES OF PALMEROLIVER PC			\$0.00 (	(P)	Ciaini		ATTN ROBERT M N PALMER THE LAW OFFICES OF PALMEROLIVER P C			\$0.00 (	
205 PARK CENTRAL E STE 511 SPRINGFIELD, MO 65806			\$1,000,000.00	U)			205 PARK CENTRAL E STE 511 SPRINGFIELD, MO 65806			\$1,000,000.00 (0	
			\$1,000,000.00 (	(T)						\$1,000,000.00	
Official Claim Date 10/8/2009							Official Claim Date 10/8/2009				
JOHANN HAY GMBH & CO KG	68626	MLCS, LLC	\$268,722.82 (	(S)		gs. 1-4	JOHANN HAY GMBH & CO KG	66661	Motors	\$268,722.82 (\$	
			\$0.00 (	A) I	debtor Duplicate				Liquidation Company	\$0.00 (A	
C/O KENNETH M LEWIS ESQ TEITELBAUM & BASKIN LLP			\$0.00 (	(P)	Claim		C/O KENNETH M LEWIS, ESQ TEITELBAUM & BASKIN, LLP			\$0.00 (1	
3 BARKER AVE, 3RD FL WHITE PLAINS, NY 10601			\$81,617.53 (	U)			3 BARKER AVENUE 3RD FLOOR WHITE PLAINS, NY 10601			\$81,916.65 (U	
			\$350,340.35 (	T)			UNITED STATES OF AMERICA			\$350,639.47 (	

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAI	MS TO BE DISA	ALLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)		rounds For ( Objection	Objection Page Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
JOHN N GRAHAM TRUSTEE	30484	MLC of Harlem, Inc.	\$0.00	(S)	Multi- debtor	Pgs. 1-4	JOHN N GRAHAM TRUSTEE	30487	MLCS, LLC	\$0.00 (S	
THOMAS J SCHANK HUNTER & SCHANK CO LPA		11101	\$0.00 (	(A)	Duplicate Claim		THOMAS J SCHANK HUNTER & SCHANK CO LPA			\$0.00 (A	
1700 CANTON AVE			\$0.00	(P)			1700 CANTON AVE			\$0.00 (P	
TOLEDO, OH 43604			\$218,934.83 (	(U)			TOLEDO, OH 43604			\$218,934.83 (U	
Official Claim Date 11/19/2009			\$218,934.83 (	(T)			Official Claim Date 11/19/2009			\$218,934.83 (T	
JOHN N GRAHAM TRUSTEE	30486	MLCS Distribution	\$0.00 (	(S)	Multi- debtor	Pgs. 1-4	JOHN N GRAHAM TRUSTEE	30487	MLCS, LLC	\$0.00 (S	
		Corporation	\$0.00 (	(A)	Duplicate Claim					\$0.00 (A	
THOMAS J SCHANK HUNTER & SCHANK CO LPA			\$0.00	(P)	Ciaiiii		THOMAS J SCHANK HUNTER & SCHANK CO LPA			\$0.00 (P	
1700 CANTON AVE ΓOLEDO, OH 43604			\$218,934.83 (	(U)			1700 CANTON AVE TOLEDO, OH 43604			\$218,934.83 (U	
Official Claim Date 11/19/2009			\$218,934.83 (	(T)			Official Claim Date 11/19/2009			\$218,934.83 (T	
5.10.10.10.10.10.10.10.10.10.10.10.10.10.							5.110.11 5.11.17.12.00)				
KATULKA, MICHAEL A	66247	Motors Liquidation	\$0.00	(S)	Multi-	Pgs. 1-4	KATULKA, MICHAEL A	66248	MLC of Harlem,	\$0.00 (S	
		Company	\$0.00 (	(A)	debtor Duplicate				Inc.	\$0.00 (A	
OLTMAN FLYNN & KUBLER 115 GALLERIA PROFESSIONAL BUILDING	915 MIDDLE		\$0.00	(P)	Claim		OLTMAN FLYNN & KUBLER 415 GALLERIA PROFESSIONAL BUILDING 91	5 MIDDLE		\$0.00 (P	
RIVER DR FORT LAUDERDALE, FL 33304			\$0.00 (	(U)			RIVER DRIVE FORT LAUDERDALE, FL 33304			\$20,000,000.00 (U	
			(	(T)						\$20,000,000.00 (T	
Official Claim Date 11/30/2009							Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS TO	BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
LEO BURNETT DETROIT INC ET AL  WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSON 225 WEST WACKER DRIVE  CHICAGO, IL 60606	64883	Remediation And Liability Management Company, Inc.	\$0.00 (S \$0.00 (A \$0.00 (P \$0.00 (U	debtor ) Duplicate Claim )	Pgs. 1-4	LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,  PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSOI 225 WEST WACKER DRIVE CHICAGO, IL 60606	,	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$0.00 (U)	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

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Exhibit A

120th Omnibus Objection

CLAIMS T	O BE DISA	ALLOWED AND	EXPUNGED			SURVIVI	NG CLAIM	S	
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,	64884	Environmental Corporate Remediation	\$0.00 (S \$0.00 (A	debtor ) Duplicate	Pgs. 1-4	LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,	64888	Motors Liquidation Company	\$0.00 (\$\)\$0.00 (\$\)\$
PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JOHNATHAN W YOUNG AND MARY E OLSO 225 WEST WACKER DRIVE CHICAGO, IL 60606		Company, Inc.	\$0.00 (P \$0.00 (U	)		PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSON 225 WEST WACKER DRIVE CHICAGO, IL 60606			\$0.00 (I \$0.00 (U
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009			
LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC, PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSO! 225 WEST WACKER DRIVE CHICAGO, IL 60606  Official Claim Date 11/30/2009	,	MLC of Harlem, Inc.	\$0.00 (S \$0.00 (A \$0.00 (P \$0.00 (U	debtor Duplicate Claim	Pgs. 1-4	LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,  PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSON 225 WEST WACKER DRIVE CHICAGO, IL 60606  Official Claim Date 11/30/2009		Motors Liquidation Company	\$0.00 (\$ \$0.00 (\$ \$0.00 (I
LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,  PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSO! 225 WEST WACKER DRIVE  CHICAGO, IL 60606  Official Claim Date 11/30/2009		MLCS Distribution Corporation	\$0.00 (S \$0.00 (A \$0.00 (P \$0.00 (U	debtor Duplicate Claim	Pgs. 1-4	LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,  PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSON 225 WEST WACKER DRIVE  CHICAGO, IL 60606  Official Claim Date 11/30/2009		Motors Liquidation Company	\$0.00 (£ \$0.00 (£ \$0.00 (1 \$0.00 (1

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIMS	O BE DISA	LLOWED AND	EXPUNGED			SURVIVING CLAIMS					
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		
LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,	64887	MLCS, LLC	\$0.00 (S \$0.00 (A	debtor	Pgs. 1-4	LEO BURNETT DETROIT INC, STARCOM MEDIAVEST GROUP INC, DIGITAS INC,	64888	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)		
PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSO 225 WEST WACKER DRIVE CHICAGO, IL 60606			\$0.00 (P \$0.00 (U	)) ()		PUBLICIS GROUPE OPERATING DIVISIONS LLC RETAIL GROUP LLC ET AL WILDMAN HARROLD ALLEN & DIXON LLP C/O JONATHAN W YOUNG AND MARY E OLSO 225 WEST WACKER DRIVE CHICAGO, IL 60606	,		\$0.00 (P) \$0.00 (U) (T)		
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009					

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS '	TO BE DISA	LLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)			ion Page erence	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
NORTHROP GRUMMAN CORPORATION	65760	MLCS, LLC	\$0.00 (	` /	debtor	gs. 1-4	NORTHROP GRUMMAN CORPORATION	65762	Motors Liquidation	\$0.00 (\$	
C/O BRIAN J HUFNAGEL ESO, AARON GERSHO	NOWITZ ESC	)	\$0.00 (	(A) E	Duplicate Claim		C/O BRIAN J HUFNAGEL ESQ, AARON GERSHO	NOWITZ ESO	Company	\$0.00 (A	
FORCHELLI, CURTO, DEEGAN, SCHWARTZ, M FERRANA LLP			\$0.00 (	(P)			PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, COHN & TERRANA LLP		\$0.00 (1		
333 EARLE OVINGTON BLVD, STE 1010			\$20,000,000.00 (	(U)			333 EARLE OVINGTON BLVD SUITE 1010			\$20,000,000.00 (U	
UNIONDALE, NY 11553			\$20,000,000.00 (	(T)			UNIONDALE, NY 11553			\$20,000,000.00 (7	
Official Claim Date 11/24/2009							Official Claim Date 11/24/2009				
NORTHROP GRUMMAN CORPORATION	65761	MLCS	\$0.00 (	(S)	Multi- Pg	gs. 1-4	NORTHROP GRUMMAN CORPORATION	65762	Motors	\$0.00 (S	
	05701	Distribution		` /	debtor	,,,,		03702	Liquidation	•	
C/O BRIAN J HUFNAGEL ESO, AARON GERSHO	ONOWITZ ESC	Corporation	\$0.00 (		Duplicate Claim		C/O BRIAN J HUFNAGEL ESO, AARON GERSHO		Company	\$0.00 (A	
FORCHELLI, CURTO, DEEGAN, SCHWARTZ, M & PURANA LLP			\$0.00 (	(P)			PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MI TERRANA LLP			\$0.00 (I	
333 EARLE OVINGTON BLVD, STE 1010			\$20,000,000.00 (	(U)			333 EARLE OVINGTON BLVD SUITE 1010			\$20,000,000.00 (U	
UNIONDALE, NY 11553			\$20,000,000.00 (	(T)			UNIONDALE, NY 11553			\$20,000,000.00 (T	
Official Claim Date 11/24/2009							Official Claim Date 11/24/2009				
NORTHROP GRUMMAN CORPORATION	65805	MLC of Harlem, Inc.	\$0.00 (	(S)	Multi- Pg debtor	gs. 1-4	NORTHROP GRUMMAN CORPORATION	65762	Motors Liquidation	\$0.00 (S	
			\$0.00 (	(A) E	Ouplicate Claim				Company	\$0.00 (A	
C/O BRIAN J HUFNAGEL ESQ & AARON GERSO ESQ	CHONOWITZ		\$0.00 (	(P)	Ciaiiii		C/O BRIAN J HUFNAGEL ESQ, AARON GERSHO PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MI			\$0.00 (F	
FORCHELLI CURTO DEEGAN SCHWARTZ MIN TERRANA LLP	EO COHN &		\$20,000,000.00 (1	(U)			TERRANA LLP 333 EARLE OVINGTON BLVD SUITE 1010			\$20,000,000.00 (U	
2333 EARLE ORINGTON BLVD SUITE 1010 UMONDALE, NY 11553			\$20,000,000.00	(T)			UNIONDALE, NY 11553			\$20,000,000.00 (T	
Official Claim Date 11/24/2009							Official Claim Date 11/24/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS 7	TO BE DISA	LLOWED AND	EXPUNGED				SURVIVING CLAIMS									
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)		U	ction Page eference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)						
NORTHROP GRUMMAN CORPORATION	69882	Environmental	\$0.00	(S)		Pgs. 1-4	NORTHROP GRUMMAN CORPORATION	65762	Motors	\$0.00 (\$						
		Corporate Remediation	\$0.00 (	(A) l	debtor Duplicate				Liquidation Company	\$0.00 (A						
RIAN J HUFNAGEL ESQ & AARON GERSHON		Company, Inc.	\$0.00	(P)	Claim		C/O BRIAN J HUFNAGEL ESQ, AARON GERSHO!			\$0.00 (I						
ORCHELLI, CURTO, DEEGAN, SCHWARTZ, MI ERRANA, LLP	INEO, COHN &	Ż	\$20,000,000.00 (	(U)			PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINEO, CO TERRANA LLP	NEO, COHN &		\$20,000,000.00 (U						
33 EARLE OVINGTON BLVD, STE 1010 JNIONDALE, NY 11553			\$20,000,000.00	(T)			333 EARLE OVINGTON BLVD SUITE 1010 UNIONDALE, NY 11553			\$20,000,000.00 (7						
Official Claim Date 1/28/2010							Official Claim Date 11/24/2009									
NORTHROP GRUMMAN CORPORATION	69883	Remediation And Liability	\$0.00	(S)	Multi- F	Pgs. 1-4	NORTHROP GRUMMAN CORPORATION	65762	Motors Liquidation	\$0.00 (\$						
		Management Company, Inc.	\$0.00 (	(A) l	Duplicate Claim				Company	\$0.00 (A						
RIAN J HUFNAGEL ESQ & AARON GERSHON			\$0.00	(P)	Ciaiiii		C/O BRIAN J HUFNAGEL ESQ, AARON GERSHONOWITZ ESQ	ONOWITZ ESQ		\$0.00 (1						
ORCHELLI, CURTO, DEEGAN, SCHWARTZ, M ERRANA, LLP	INEO, COHN &	ž	\$20,000,000.00 (	(U)			PORCHELLI, CURTO, DEEGAN, SCHWARTZ, MINTERRANA LLP	MINEO, COHN &	MINEO, COHN &	IINEO, COHN &	MINEO, COHN &	MINEO, COHN &	IINEO, COHN &	NEO, COHN &		\$20,000,000.00 (U
33 EARLE OVINGTON BLVD, STE 1010 JNIONDALE, NY 11553			\$20,000,000.00	(T)			333 EARLE OVINGTON BLVD SUITE 1010 UNIONDALE, NY 11553			\$20,000,000.00 (7						
Official Claim Date 1/28/2010							Official Claim Date 11/24/2009									
NYS DEPARTMENT OF ENVIRONMENTAL	50825	Remediation And	\$0.00	(S)	Multi- F	Pgs. 1-4	NYS DEPARTMENT OF ENVIRONMENTAL CONSERVATION	50824	Motors Liquidation	\$0.00 (\$						
CONSERVATION		Liability Management Company, Inc.	\$0.00 (	(A) l	Duplicate Claim		CONSERVATION		Company	\$0.00 (A						
AUREEN F LEARY ESQ		Company, mc.	\$0.00	(P)	Ciaiiii		MAUREEN F LEARY ESQ			\$0.00 (I						
SSISTANT ATTORNEY GENERAL NVIRONMENTAL PROTECTION BUREAU	DYTO		\$18,847,048.12 (	(U)			ASSISTANT ATTORNEY GENERAL ENVIRONMENTAL PROTECTION BUREAU	vmov.		\$18,847,048.12 (U						
OFFICE OF THE ATTORNEY GENERAL THE CA LLBANY, NY 12224	PITOL		\$18,847,048.12	(T)			OFFICE OF THE ATTORNEY GENERAL THE CAP ALBANY, NY 12224	TTOL		\$18,847,048.12 (7						
Official Claim Date 11/25/2009							Official Claim Date 11/25/2009									

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIN	IS TO BE DISA	LLOWED AND	EXPUNGED			SURVI	VING CLAIM	S	
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)
PETROLEUM TANK CLEANERS INC	69940	Environmental Corporate	\$0.00 (S	) Multi- debtor	Pgs. 1-4	PETROLEUM TANK CLEANERS, INC	59071	Motors Liquidation	\$0.00 (S)
		Remediation Company, Inc.	\$0.00 (A)	) Duplicate Claim				Company	\$0.00 (A)
C/O BEVERIDGE & DIAMOND PC		Company, me.	\$0.00 (P)			BEVERIDGE & DIAMOND, PC			\$0.00 (P)
ATTN MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR			\$4,800,000.00 (U	)		ATT MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR			\$4,800,000.00 (U)
NEW YORK, NY 10022			\$4,800,000.00 (T	)		NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$4,800,000.00 (T)
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009			
PETROLEUM TANK CLEANERS INC	69941	Remediation And	\$0.00 (S	) Multi-	Pgs. 1-4	PETROLEUM TANK CLEANERS, INC	59071	Motors	\$0.00 (\$)
		Liability Management	\$0.00 (A)	debtor ) Duplicate				Liquidation Company	\$0.00 (A)
C/O BEVERIDGE & DIAMOND PC		Company, Inc.	\$0.00 (P	Claim		BEVERIDGE & DIAMOND, PC			\$0.00 (P
ATTN MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR			\$4,800,000.00 (U	)		ATT MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR			\$4,800,000.00 (U
NEW YORK, NY 10022			\$4,800,000.00 (T			NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$4,800,000.00 (T)
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009			
Official Claim Date 2/1/2010						Official Claim Date 11/27/2009			

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

Motors Liquidation Company, et al. Case No. 09-50026 (REG), Jointly Administered

120th Omnibus Objection

CLAIM	IS TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
PETROLEUM TANK CLEANERS, INC	59072	MLC of Harlem, Inc.	\$0.00 (S	Multi- debtor	Pgs. 1-4	PETROLEUM TANK CLEANERS, INC	59071	Motors Liquidation	\$0.00 (S	
BEVERIDGE & DIAMOND, PC			\$0.00 (A	Duplicate Claim		BEVERIDGE & DIAMOND, PC		Company	\$0.00 (A	
ATT MICHAEL MUPHY, ESQ			\$0.00 (F			ATT MICHAEL MURPHY ESQ			\$0.00 (P	
477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022			\$4,800,000.00 (U	T)		477 MADISON AVENUE 15TH FLOOR NEW YORK, NY 10022			\$4,800,000.00 (U	
UNITED STATES OF AMERICA			\$4,800,000.00 (T	")		UNITED STATES OF AMERICA			\$4,800,000.00 (T	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				
PETROLEUM TANK CLEANERS, INC	59073	MLCS, LLC	\$0.00 (S	i) Multi-	Pgs. 1-4	PETROLEUM TANK CLEANERS, INC	59071	Motors	\$0.00 (S	
			\$0.00 (A	debtor  Duplicate				Liquidation Company	\$0.00 (A	
BEVERIDGE & DIAMOND, PC ATT MICHAEL MURPHY, ESO			\$0.00 (F	Claim		BEVERIDGE & DIAMOND, PC ATT MICHAEL MURPHY ESO			\$0.00 (P	
477 MADISON AVENUE, 15TH FLOOR			\$4,800,000.00 (U	n N		477 MADISON AVENUE 15TH FLOOR			\$4,800,000.00 (U	
NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$4,800,000.00 (T			NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$4,800,000.00 (T	
Official Claim Date 11/27/2009			4 ',000',000' (-	,		Official Claim Date 11/27/2009			7 ,,, (-	
PETROLEUM TANK CLEANERS, INC	59074	MLCS	\$0.00 (S	i) Multi-	Pgs. 1-4	PETROLEUM TANK CLEANERS, INC	59071	Motors	\$0.00 (S	
TETROLLEN THERE CELLINERS, INC	3,071	Distribution Corporation	\$0.00 (A	debtor	1 53. 1 4	TEMOLLEM THIN CLL INLEG, INC	37071	Liquidation Company	\$0.00 (S	
C/O BEVERIDGE & DIAMOND PC		Corporation		Claim		BEVERIDGE & DIAMOND, PC		Company		
ATTN MICHAEL MURPHY ESQ 477 MADISON AVE 15TH FLOOR			\$0.00 (F			ATT MICHAEL MURPHY ESQ 477 MADISON AVENUE 15TH FLOOR			\$0.00 (P	
NEW YORK, NY 10022			\$4,800,000.00 (U			NEW YORK, NY 10022 UNITED STATES OF AMERICA			\$4,800,000.00 (U	
			\$4,800,000.00 (T	)					\$4,800,000.00 (T	
Official Claim Date 11/27/2009						Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

CLAIMS T	TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds l Objection	For Objection Page on Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
QUANTA RESOURCES CORP	67104	MLCS, LLC	\$0.00 (	debto	r	QUANTA RESOURCES CORP	67107	Motors Liquidation	\$0.00 (S	
ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP			\$0.00 (A \$0.00 (	Clair		C/O ALLEN G REITER ESQ/JAMES M SULLIV. ARENT FOX LLP	AN ESQ	Company	\$0.00 (A \$0.00 (P	
1675 BROADWAY NEW YORK, NY 10019			\$4,800,000.00 (	J)		1675 BROADWAY NEW YORK, NY 10019			\$4,800,000.00 (U	
			\$4,800,000.00	Γ)					\$4,800,000.00 (T)	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				
QUANTA RESOURCES CORP	67105	MLCS	\$0.00 (	,		QUANTA RESOURCES CORP	67107	Motors	\$0.00 (S)	
		Distribution Corporation	\$0.00 (		ate			Liquidation Company	\$0.00 (A)	
ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP 1675 BROADWAY			\$0.00 (	Clain P)	n	C/O ALLEN G REITER ESQ/JAMES M SULLIV. ARENT FOX LLP 1675 BROADWAY	AN ESQ		\$0.00 (P)	
NEW YORK, NY 10019			\$4,800,000.00	J)		NEW YORK, NY 10019			\$4,800,000.00 (U)	
Official Claim Date 11/30/2009			\$4,800,000.00 (	Γ)		Official Claim Date 11/30/2009			\$4,800,000.00 (T)	
Official Chamil Pate 11/39/2007						Official Claim Date 11/30/2007				
QUANTA RESOURCES CORP	67106	MLC of Harlem, Inc.	\$0.00 (	S) Multi		QUANTA RESOURCES CORP	67107	Motors Liquidation	\$0.00 (S)	
		mc.	\$0.00 (2		ate			Company	\$0.00 (A)	
C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ARENT FOX LLP	LESQ		\$0.00 (		1	C/O ALLEN G REITER ESQ/JAMES M SULLIV. ARENT FOX LLP	AN ESQ		\$0.00 (P)	
1675 BROADWAY NEW YORK, NY 10019			\$4,800,000.00	J)		1675 BROADWAY NEW YORK, NY 10019			\$4,800,000.00 (U)	
			\$4,800,000.00 (	Γ)					\$4,800,000.00 (T)	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS '	FO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds Fo	•	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
QUANTA RESOURCES CORP	67108	MLC of Harlem, Inc.	\$0.00 (S \$0.00 (A	debtor	Pgs. 1-4	QUANTA RESOURCES CORP	67111	Motors Liquidation Company	\$0.00 (S \$0.00 (A	
C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ARENT FOX LLP	N ESQ		\$0.00 (A	Claim		ALLEN G REITER, ESQ JAMES M SULLIVAN ESQ		Company	\$0.00 (F	
1675 BROADWAY			\$20,000,000.00 (U	,		ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	
NEW YORK, NY 10019			\$20,000,000.00 (T	T)		NEW YORK, NY 10019			\$20,000,000.00 (T	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				
QUANTA RESOURCES CORP	67109	MLCS	\$0.00 (S	*	Pgs. 1-4	QUANTA RESOURCES CORP	67111	Motors	\$0.00 (S	
		Distribution Corporation	\$0.00 (A		e			Liquidation Company	\$0.00 (A	
C/O ALLEN G REITER ESQ/JAMES M SULLIVA? ARENT FOX LLP	N ESQ		\$0.00 (F	Claim P)		ALLEN G REITER, ESQ JAMES M SULLIVAN ESQ			\$0.00 (F	
1675 BROADWAY			\$20,000,000.00 (U	J)		ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	
NEW YORK, NY 10019			\$20,000,000.00 (T	7)		NEW YORK, NY 10019			\$20,000,000.00 (T	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				
QUANTA RESOURCES CORP	67110	MLCS, LLC	\$0.00 (S	,	Pgs. 1-4	QUANTA RESOURCES CORP	67111	Motors	\$0.00 (S	
			\$0.00 (A	, .	e			Liquidation Company	\$0.00 (A	
C/O ALLEN G REITER ESQ/JAMES M SULLIVAY ARENT FOX LLP	N ESQ		\$0.00 (F	Claim P)		ALLEN G REITER, ESQ JAMES M SULLIVAN ESQ			\$0.00 (F	
1675 BROADWAY			\$20,000,000.00 (U	J)		ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	
NEW YORK, NY 10019			\$20,000,000.00 (T	7)		NEW YORK, NY 10019			\$20,000,000.00 (T	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

CLAIMS TO BE DISALLOWED AND EXPUNGED						SURVIVING CLAIMS			
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
QUANTA RESOURCES CORPORATION	69899	Remediation And	\$0.00 (S)		e e	QUANTA RESOURCES CORP	67107	Motors	\$0.00 (\$
		Liability Management Company, Inc.	\$0.00 (A)	debtor Duplicate Claim				Liquidation Company	\$0.00 (A
C/O ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ			\$0.00 (P)			C/O ALLEN G REITER ESQ/JAMES M SULLIVAN ESQ			\$0.00 (I
RENT FOX LLP 675 BROADWAY			\$4,800,000.00 (U)		ARENT FOX LLP 1675 BROADWAY		\$4,800,000.00 (U		
NEW YORK, NY 10019			\$4,800,000.00 (T)			NEW YORK, NY 10019			\$4,800,000.00 (7
Official Claim Date 1/28/2010						Official Claim Date 11/30/2009			
Official Claim Date 1/28/2010  QUANTA RESOURCES CORPORATION	69900	Environmental	\$0.00 (S)	Multi-	Pgs. 1-4	Official Claim Date 11/30/2009  QUANTA RESOURCES CORP	67107	Motors	\$0.00 (
	69900	Corporate		debtor	Pgs. 1-4		67107	Liquidation	
	69900		\$0.00 (A)	debtor Duplicate Claim	Pgs. 1-4		67107		\$0.00 (S \$0.00 (A
QUANTA RESOURCES CORPORATION  C/O ALLEN G REITER ESQ & JAMES M SULLI		Corporate Remediation		debtor Duplicate Claim	Pgs. 1-4	QUANTA RESOURCES CORP  C/O ALLEN G REITER ESQ/JAMES M SULLIN		Liquidation	
QUANTA RESOURCES CORPORATION C/O ALLEN G REITER ESQ & JAMES M SULLI ARENT FOX LLP		Corporate Remediation	\$0.00 (A)	debtor Duplicate Claim	Pgs. 1-4	QUANTA RESOURCES CORP		Liquidation	\$0.00 (A
		Corporate Remediation	\$0.00 (A) \$0.00 (P)	debtor Duplicate Claim	Pgs. 1-4	QUANTA RESOURCES CORP  C/O ALLEN G REITER ESQ/JAMES M SULLIVARENT FOX LLP		Liquidation	\$0.00 (A \$0.00 (I

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

120th Omnibus Objection

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Exhibit A

CLAIMS	TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
QUANTA RESOURCES CORPORATION	69901	Environmental Corporate Remediation Company, Inc.	\$0.00 (S) \$0.00 (A)	debtor	Pgs. 1-4	QUANTA RESOURCES CORP	67111	Motors Liquidation Company	\$0.00 (S \$0.00 (A	
C/O ALLEN G REITER ESQ & JAMES M SULLIV	AN ESQ	company, me.	\$0.00 (P)			ALLEN G REITER, ESQ			\$0.00 (P	
ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	)		JAMES M SULLIVAN ESQ ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	
NEW YORK, NY 10019			\$20,000,000.00 (T	)		NEW YORK, NY 10019			\$20,000,000.00 (T	
Official Claim Date 1/28/2010						Official Claim Date 11/30/2009				
QUANTA RESOURCES CORPORATION	69902	Remediation And	\$0.00 (S		Pgs. 1-4	QUANTA RESOURCES CORP	67111	Motors	\$0.00 (S	
		Liability Management Company, Inc.	\$0.00 (A)	debtor Duplicate Claim				Liquidation Company	\$0.00 (A	
ALLEN G REITER, ESQ, AND JAMES SULLIVA	N, ESQ	Company, mc.	\$0.00 (P)			ALLEN G REITER, ESQ			\$0.00 (P	
ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	)		JAMES M SULLIVAN ESQ ARENT FOX LLP			\$20,000,000.00 (U	
NEW YORK, NY 10019			\$20,000,000.00 (T)	)		1675 BROADWAY NEW YORK, NY 10019			\$20,000,000.00 (T	
Official Claim Date 1/28/2010						Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS	S TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds F Objectio		Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
QUANTA SITE GROUP	67100	MLCS Distribution Corporation	\$0.00 (\$ \$0.00 (\$	debtor		QUANTA SITE GROUP	67103	Motors Liquidation Company	\$0.00 (S \$0.00 (A	
ALLEN G REITER, ESQ JAMES M SULLIVAN, ESQ			\$0.00 (1	Claim P)	1	ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP			\$0.00 (F	
ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	J)		1675 BROADWAY			\$20,000,000.00 (U	
NEW YORK, NY 10019			\$20,000,000.00	Γ)		NEW YORK, NY 10019			\$20,000,000.00 (T	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				
QUANTA SITE GROUP	67101	MLC of Harlem,	\$0.00 (3	,		QUANTA SITE GROUP	67103	Motors Liquidation	\$0.00 (S	
	REITER & JAMES M SULLIVAN	\$0.00 (A	Claim	te			Company	\$0.00 (A		
ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP		\$0.00 (1		1	ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP			\$0.00 (F		
1675 BROADWAY NEW YORK, NY 10019			\$20,000,000.00 (U	J)		1675 BROADWAY NEW YORK, NY 10019			\$20,000,000.00 (U	
NEW TORK, NT 10019			\$20,000,000.00	Γ)		NEW TORK, NT 10019			\$20,000,000.00 (T	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				
QUANTA SITE GROUP	67102	MLCS, LLC	\$0.00 (3	S) Multi-	Pec 1.4	QUANTA SITE GROUP	67103	Motors	\$0.00 (S	
QUANTA SITE GROUP	67102	MLCS, LLC		debtor	:	QUANTA SITE GROUP	0/103	Liquidation	•	
ALLEN G REITER & JAMES M SULLIVAN			\$0.00 (A	A) Duplica Claim		ALLEN G REITER & JAMES M SULLIVAN		Company	\$0.00 (A	
ARENT FOX LLP 1675 BROADWAY	TT FOX LLP	\$0.00 (1	P)		ARENT FOX LLP 1675 BROADWAY			\$0.00 (P		
NEW YORK, NY 10019			\$20,000,000.00 (U	J)		NEW YORK, NY 10019			\$20,000,000.00 (U	
			\$20,000,000.00	Γ)					\$20,000,000.00 (T	
Official Claim Date 11/30/2009						Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS	TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS			
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)		nds For Objection Page ection Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
QUANTA SITE GROUP	69897	Environmental Corporate Remediation Company, Inc.	\$0.00 (S \$0.00 (A	de A) Dur	Multi- Pgs. 1-4 ebtor plicate Claim	QUANTA SITE GROUP	67103	Motors Liquidation Company	\$0.00 (S
C/O ALLEN G REITER ESQ & JAMES M SULLIV ARENT FOX LLP	'AN ESQ	Company, mc.	\$0.00 (1		Jami	ALLEN G REITER & JAMES M SULLIVAN ARENT FOX LLP			\$0.00 (1
1675 BROADWAY			\$20,000,000.00 (U	J)		1675 BROADWAY			\$20,000,000.00 (U
NEW YORK, NY 10019			\$20,000,000.00	Γ)		NEW YORK, NY 10019			\$20,000,000.00 (7
Official Claim Date 1/28/2010						Official Claim Date 11/30/2009			
QUANTA SITE GROUP	69898	Remediation And	\$0.00 (3	,	Multi- Pgs. 1-4	QUANTA SITE GROUP	67103	Motors	\$0.00 (S
		Liability Management	\$0.00 (A	A) Dup	ebtor plicate Claim			Liquidation Company	\$0.00 (A
C/O ALLEN G REITER ESQ & JAMES M SULLIV	ALLEN G REITER ESQ & JAMES M SULLIVAN ESQ	Company, Inc.	\$0.00 (1		-iaiiii	ALLEN G REITER & JAMES M SULLIVAN			\$0.00 (1
ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U	J)		ARENT FOX LLP 1675 BROADWAY			\$20,000,000.00 (U
NEW YORK, NY 10019			\$20,000,000.00	Γ)		NEW YORK, NY 10019			\$20,000,000.00 (7
Official Claim Date 1/28/2010						Official Claim Date 11/30/2009			
ROBERT A GLADSTONE, ON BEHALF OF THE	1226	MLC of Harlem,	\$0.00 (	S) M	Лulti- Pgs. 1-4	ROBERT A GLADSTONE, ON BEHALF OF THE	1225	Motors	\$0.00 (\$
CLAIMANTS ON EXHIBIT "A'		Inc.	\$0.00 (A		ebtor plicate			Liquidation Company	\$0.00 (A
ROBERT A GLADSTONE,ESQ SZAFERMAN, LAKIND, BLUMSTEIN & BLADE	R, PC		\$0.00 (1	Ć	Claim	CLAIMANTS ON EXHIBIT "A" ON ATTACHED ST ROBERT A GLADSTONE, ESQ	MT OF CLM	1,	\$0.00 (I
01 GROVERS MILL ROAD, SUITE 200			\$10,100,554.50 (U	J)		SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, 101 GROVERS MILL ROAD, SUITE 200	PC		\$10,100,554.50 (U
AWRENCEVILLE, NJ 08648			\$10,100,554.50	Γ)		LAWRENCEVILLE, NJ 08648			\$10,100,554.50 (7
Official Claim Date 8/24/2009						Official Claim Date 8/24/2009			

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS TO	D BE DISA	LLOWED AND	<b>EXPUNGED</b>	CLAIMS TO BE DISALLOWED AND EXPUNGED							
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds Fo Objection		Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		
ROBERT A GLADSTONE, ON BEHALF OF THE CLAIMANTS ON EXHIBIT "A"	1227	MLCS Distribution Corporation	\$0.00 (S \$0.00 (A	debtor	Pgs. 1-4	ROBERT A GLADSTONE, ON BEHALF OF THE	1225	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)		
ROBERT A GLASTONE, ESQ SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, 101 GROVERS MILL ROAD, SUITE 200	PC		\$0.00 (P	Claim		CLAIMANTS ON EXHIBIT "A" ON ATTACHED STMT ROBERT A GLADSTONE, ESQ SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, PC		Company	\$0.00 (P		
101 GROVERS MILL ROAD, SUITE 200			\$10,100,554.50 (U	)		101 GROVERS MILL ROAD, SUITE 200	rc		\$10,100,554.50 (U		
LAWRENCEVILLE, NJ 08648			\$10,100,554.50 (T	)		LAWRENCEVILLE, NJ 08648			\$10,100,554.50 (T		
Official Claim Date 8/24/2009						Official Claim Date 8/24/2009					
ROBERT A GLADSTONE, ON BEHALF OF THE CLAIMANTS ON EXHIBIT "A"	1228	MLCS, LLC	\$0.00 (S	) Multi- debtor	Pgs. 1-4	ROBERT A GLADSTONE, ON BEHALF OF THE	1225	Motors Liquidation	\$0.00 (S		
CLAIMANTS ON EARIBIT A			\$0.00 (A	A) Duplicate	;			Company	\$0.00 (A		
ROBERT A GLADSTONE, ESQ SZAFERMAN, LAKIND, BLUMSTEIN & BLADER,	PC		\$0.00 (P	Claim )		CLAIMANTS ON EXHIBIT "A" ON ATTACHED ST ROBERT A GLADSTONE, ESQ			\$0.00 (P		
101 GROVERS MILL ROAD, SUITE 200			\$10,100,554.50 (U	)		SZAFERMAN, LAKIND, BLUMSTEIN & BLADER, 101 GROVERS MILL ROAD, SUITE 200	PC		\$10,100,554.50 (U		
LAWRENCEVILLE, NJ 08648			\$10,100,554.50 (T	)		LAWRENCEVILLE, NJ 08648			\$10,100,554.50 (T		
Official Claim Date 8/24/2009						Official Claim Date 8/24/2009					
SENTRY INSURANCE A MUTUAL COMPANY	44304	MLCS, LLC	\$0.00 (S	,	Pgs. 1-4	SENTRY SELECT INSURANCE COMPANY	44306	Motors	\$0.00 (S		
			\$0.00 (A	debtor ) Duplicate	<b>;</b>			Liquidation Company	\$0.00 (A		
ATTN KENNETH J ERLER ASSOCIATES COUNSI 1800 NORTH POINT DR	EL		\$0.00 (P	Claim		ATTN KENNETH J ERLER ASSOCIATE COUNSEI 1800 NORTH POINT DR			\$0.00 (P		
STEVENS POINT, WI 54481			\$0.00 (U	)		STEVENS POINT, WI 54481			\$0.00 (U		
Official Claim Date 11/24/2009			(T	)		Official Claim Date 11/24/2009			(T)		

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS TO	) BE DISA	ALLOWED AND	EXPUNGED				SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	d (	Grounds For ( Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
SHAWN MARCOTTE	58974	MLC of Harlem, Inc.	\$0.00 ( \$0.00 (	` ′	Multi- debtor Duplicate	Pgs. 1-4	SHAWN MARCOTTE	58977	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)	
C/O ROBERT L RATTET, ESQ RATTET, PESTERNAK & GORDON-OLIVER, LLP			\$0.00 (		Claim		C/O ROBERT L RATTET, ESQ RATTET, PASTERNAK & GORDON-OLIVER, LLP		Company	\$0.00 (P)	
550 MAMARONECK AVENUE, STE 510 HARRISON, NY 10528			\$1,000,000.00 (	(U)			550 MAMARONECK AVENUE, STE 510 HARRISON, NY 10528			\$1,000,000.00 (U)	
			\$1,000,000.00 (	(T)						\$1,000,000.00 (T)	
Official Claim Date 11/27/2009							Official Claim Date 11/27/2009				
SHAWN MARCOTTE	58975	MLCS	\$0.00 (	(S)	Multi-	Pgs. 1-4	SHAWN MARCOTTE	58977	Motors	\$0.00 (S)	
	RNAK & GORDON-OLIVER, LLP	\$0.00 (	(A)					Liquidation Company	\$0.00 (A)		
C/O ROBERT L RATTET, ESQ RATTET, PASTERNAK & GORDON-OLIVER, LLP 550 MAMARONECK AVENUE, STE 510			\$0.00	(P)	Claim P)		C/O ROBERT L RATTET, ESQ RATTET, PASTERNAK & GORDON-OLIVER, LLP 550 MAMARONECK AVENUE, STE 510			\$0.00 (P)	
HARRISON, NY 10528			\$1,000,000.00 (	(U)			HARRISON, NY 10528			\$1,000,000.00 (U)	
			\$1,000,000.00 (	(T)						\$1,000,000.00 (T)	
Official Claim Date 11/27/2009							Official Claim Date 11/27/2009				
SHAWN MARCOTTE	58976	MLCS, LLC	\$0.00	(S)	Multi-	Pgs. 1-4	SHAWN MARCOTTE	58977	Motors	\$0.00 (S)	
			\$0.00 (	(A)	debtor Duplicate				Liquidation Company	\$0.00 (A)	
C/O ROBERT L RATTET, ESQ RATTET, PASTERNAK & GODRON-OLIVER, LLP			\$0.00	(P)	Claim		C/O ROBERT L RATTET, ESQ RATTET, PASTERNAK & GORDON-OLIVER, LLP			\$0.00 (P)	
550 MAMARONECK AVENUE, STE 510 HARRISON, NY 10528			\$1,000,000.00 (	(U)			550 MAMARONECK AVENUE, STE 510 HARRISON, NY 10528			\$1,000,000.00 (U)	
			\$1,000,000.00	(T)						\$1,000,000.00 (T)	
Official Claim Date 11/27/2009							Official Claim Date 11/27/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIM	S TO BE DISA	ALLOWED AND	EXPUNGED	SURVIVING CLAIMS					
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)		unds For Objection Pa ojection Reference		Claim#	Debtor	Claim Amount and Priority (1)
STATE OF CONNECTICUT	9192	MLC of Harlem, Inc.	\$0.00 (		Multi- Pgs. 1-4 debtor	STATE OF CONNECTICUT	9194	Motors	\$0.00 (S
		inc.	\$0.00 (	A) Duplicate	Ouplicate			Liquidation Company	\$0.00 (A
UNCLAIMED PROPERTY DIV 55 ELM STREET 7TH FLOOR		\$0.00 (		Claim	UNCLAIMED PROPERTY DIV 55 ELM ST 7TH FL			\$0.00 (I	
HARTFORD, CT 06106			\$0.00 (	U)		HARTFORD, CT 06106			\$0.00 (U
Official Claim Date 10/13/2009			C	Т)		Official Claim Date 10/13/2009			T)
STATE OF CONNECTICUT	9193	MLCS Distribution	\$0.00 (		Multi- Pgs. 1-4	STATE OF CONNECTICUT	9194	Motors Liquidation	\$0.00 (S
I'd A H (ED DD ODEDEW DW)	Corporation MED PROPERTY DIV	\$0.00 (				Company	\$0.00 (A		
UNCLAIMED PROPERTY DIV 55 ELM ST 7TH FL			\$0.00 (		Claim	UNCLAIMED PROPERTY DIV 55 ELM ST 7TH FL			\$0.00 (F
HARTFORD, CT 06106			\$0.00 (	U)		HARTFORD, CT 06106			\$0.00 (U
Official Claim Date 10/13/2009			(	T)		Official Claim Date 10/13/2009			Γ)
STATES OF CONNECTICUT	9195	MLCS, LLC	\$0.00 (		Multi- Pgs. 1-4 debtor	STATE OF CONNECTICUT	9194	Motors Liquidation	\$0.00 (S
			\$0.00 (	A) Di	Ouplicate			Company	\$0.00 (A
INCLAIMED PROPERTY DIV 5 ELM ST 7TH FL IARTFORD, CT 06106			\$0.00 (		Claim	UNCLAIMED PROPERTY DIV 55 ELM ST 7TH FL			\$0.00 (F
		\$0.00 (	U)		HARTFORD, CT 06106			\$0.00 (U	
Official Claim Date 10/13/2009			(	T)		Official Claim Date 10/13/2009			T)

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

120th Omnibus Objection

CLAINS I	O BE DISA	ALLOWED AND	EXPUNGED	SURVIVING CLAIMS						
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		Frounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)
STEPAN COMPANY	1419	MLCS Distribution	\$0.00 (	` ′	Multi- debtor	Pgs. 1-4	STEPAN COMPANY	1458	Motors Liquidation	\$0.00 (S \$0.00 (A
IN TIMOTHY W GARVEY ESQ LATSHA DAVIS YOHE & MCKENNA PC FAGI EVIEW BLVD STE 100		Corporation	\$0.00 ( \$0.00 (		Duplicate Claim		ATTN TIMOTHY W GARVEY ESQ LATSHA DAVIS YOHE & MCKENNA P C		Company	\$0.00 (A \$0.00 (F
350 EAGLEVIEW BLVD STE 100 EXTON, PA 19341			\$10,100,000.00 (	U)			350 EAGLEVIEW BLVD SUITE 100 EXTON, PA 19341			\$10,100,000.00 (U
Official Claim Date 9/18/2009			\$10,100,000.00 (	(T)			Official Claim Date 9/21/2009			\$10,100,000.00 (T
TEPAN COMPANY TTN TIMOTHY W GARVEY ESQ		1420 MLCS, LLC	\$0.00 (	` ′	Multi- debtor	Pgs. 1-4	STEPAN COMPANY	1458	Motors Liquidation	\$0.00 (S
		\$0.00 (		Claim		ATTN TIMOTHY W GARVEY ESQ		Company	\$0.00 (A	
C/O LATSHA DAVIS YOHE & MCKENNA PC 350 EAGLEVIEW BLVD STE 100			\$0.00 ( \$10,100,000.00 (				LATSHA DAVIS YOHE & MCKENNA P C 350 EAGLEVIEW BLVD SUITE 100			\$0.00 (I \$10,100,000.00 (U
EXTON, PA 19341			\$10,100,000.00 (	,			EXTON, PA 19341			\$10,100,000.00 (C
Official Claim Date 9/18/2009							Official Claim Date 9/21/2009			
STEPAN COMPANY	1457	MLC of Harlem,	\$0.00 (	(S)	Multi-	Pgs. 1-4	STEPAN COMPANY	1458	Motors	\$0.00 (S
		Inc.	\$0.00 (	(A)	debtor Duplicate				Liquidation Company	\$0.00 (A
ATTN TIMOTHY W GARVEY ESQ LATSHA DAVIS YOHE & MCKENNA P C			\$0.00 (	(P)	Claim		ATTN TIMOTHY W GARVEY ESQ LATSHA DAVIS YOHE & MCKENNA P C			\$0.00 (I
350 EAGLEVIEW BLVD SUITE 100 EXTON, PA 19341			\$10,100,000.00 (	U)			350 EAGLEVIEW BLVD SUITE 100 EXTON, PA 19341			\$10,100,000.00 (U
			\$10,100,000.00 (	(T)						\$10,100,000.00 (7

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

120th Omnibus Objection

CLAIMS 7	TO BE DISA	LLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)		ands For Objection Page ejection Reference	Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
THORPE JENNINE	20078	MLCS, LLC	\$0.00 (\$	,	Multi- Pgs. 1-4	THORPE JENNINE	20079	Motors	\$0.00 (S	
			\$0.00 (A	A) Di	debtor uplicate			Liquidation Company	\$0.00 (A	
THORPE, JENNINE SISKIND CROMARTY IVEY & DOWLER LLP			\$0.00 (1		Claim	THORPE, JENNINE 680 WATERLOO STREET P. O. BOX 2520			\$0.00 (P	
680 WATERLOO STREET P. O. BOX 2520 LONDON ON N6A 3V8 CANADA			\$1,200,000.00 (U	J)		LONDON ON N6A 3V8 CANADA			\$1,200,000.00 (U	
, CANADA			\$1,200,000.00	Γ)		, CANADA			\$1,200,000.00 (T	
Official Claim Date 11/5/2009						Official Claim Date 11/5/2009				
TREASURER OF VIRGINIA	39081	MLCS Distribution	\$0.00 (	,	Multi- Pgs. 1-4 debtor	TREASURER OF VIRGINIA	39083	Motors Liquidation	\$0.00 (S	
	Corpor	Corporation	\$0.00 (A	A) Dı	uplicate Claim	COMMONWEALTH OF VIDCINIA		Company	\$0.00 (A	
COMMONWEALTH OF VIRGINIA DEPARTMENT TREASURY	T OF THE	\$0.00 (I		Ciaiiii	COMMONWEALTH OF VIRGINIA DEPARTMENT OF THE TREASURY DIVISION OF			\$0.00 (P		
DIVISION OF UNCLAIMED PROPERTY PO BOX 2478			\$0.00 (U	J)		UNCLAIMED PROPERTY PO BOX 2478			\$0.00 (U	
RICHMOND, VA 23218			(*.	Γ)		RICHMOND, VA 23218			(T	
Official Claim Date 11/23/2009						Official Claim Date 11/23/2009				
TENERAL STATE OF ME COME	20002	MICCALC	<b>60.00</b> (4	g) 1	W.E. B. 14	TDE ACURED OF VID CDVA	20002		<b>*</b> 0.00 (0	
TREASURER OF VIRGINIA	39082	MLCS, LLC	\$0.00 (	, (	Multi- Pgs. 1-4 debtor	TREASURER OF VIRGINIA	39083	Motors Liquidation	\$0.00 (S	
COMMONWEALTH OF VIRGINIA DEPARTMEN	T OF THE		\$0.00 (A		uplicate Claim	COMMONWEALTH OF VIRGINIA		Company	\$0.00 (A	
TREASURY DIVISION OF UNCLAIMED PROPERTY		\$0.00 (P)			DEPARTMENT OF THE TREASURY DIVISION OF UNCLAIMED PROPERTY			\$0.00 (P		
PO BOX 2478 RICHMOND, VA 23218			\$0.00 (U	J)		PO BOX 2478 RICHMOND, VA 23218			\$0.00 (U	
RICHIVIOND, VA 23210			(7	Γ)		RICHIVIOND, VA 23216			(T	
Official Claim Date 11/23/2009						Official Claim Date 11/23/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS IC	) RE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds For Objection	Objection Page Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
TREASURER STATE OF NEW JERSEY	16844	MLCS, LLC	\$0.00 (S	debtor	Pgs. 1-4	TREASURER STATE OF NEW JERSEY	16843	Motors Liquidation	\$0.00 (S	
UNCLAIMED PROPERTY DIVISION			\$0.00 (A	) Duplicate Claim		UNCLAIMED PROPERTY DIVISION		Company	\$0.00 (A	
PO BOX 214			\$0.00 (P	) (P)	PO BOX 214			\$0.00 (P		
TRENTON, NJ 08646			\$0.00 (U	)		TRENTON, NJ 08646			\$0.00 (U	
Official Claim Date 10/27/2009			(T	)		Official Claim Date 10/27/2009			T)	
UNITED STATES OF AMERICA	70254	Remediation And	\$0.00 (S	) Multi-	Pgs. 1-4	UNITED STATES OF AMERICA	64064	Motors	\$0.00 (S	
		Liability Management	\$0.00 (A	debtor ) Duplicate	C			Liquidation Company	\$0.00 (A	
		Company, Inc.		Claim P)				Company		
D/B/O DEPARTMENT OF THE TREASURY C/O AUSAS NATALIE N KUEHLER/DAVID S JONES	S		\$0.00 (P			C/O UNITED STATES ATTORNEY'S OFFICE NATALIE N KUEHLER, AUSA			\$0.00 (F	
US ATTORNEY'S OFFICE SDNY 86 CHAMBERS ST 3RD FLOOR			\$0.00 (U			86 CHAMBERS STREET, 3RD FLOOR			\$2,024,258,337.00 (U	
NEW YORK, NY 20007			\$0.00 (T			NEW YORK, NY 10007			\$2,024,258,337.00 (T	
Official Claim Date 4/16/2010						Official Claim Date 11/30/2009				
UNITED STATES OF AMERICA	70255	Environmental	\$0.00 (S	) Multi-	Pgs. 1-4	UNITED STATES OF AMERICA	64064	Motors	\$0.00 (S	
		Corporate Remediation	\$0.00 (A	debtor ) Duplicate	C			Liquidation Company	\$0.00 (A	
		Company, Inc.		Claim				Company	\$0.00 (F	
O/B/O DEPARTMENT OF THE TREASURY C/O AUSAS N N KUEHLER/D S JONES			\$0.00 (P			C/O UNITED STATES ATTORNEY'S OFFICE NATALIE N KUEHLER, AUSA				
ATTORNEY'S OFFICE SDNY CHAMBERS ST 3RD FLOOR			\$0.00 (U	,		86 CHAMBERS STREET, 3RD FLOOR			\$2,024,258,337.00 (U	
NEW YORK, NY 20007			\$0.00 (T	)		NEW YORK, NY 10007			\$2,024,258,337.00 (T	
Official Claim Date 4/16/2010						Official Claim Date 11/30/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIMS 7	TO BE DISA	ALLOWED AND	EXPUNGED			SURVIVING CLAIMS				
Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds Fo		Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	
WILLIAM MORRIS AGENCY LLC	47999	MLCS Distribution Corporation	\$0.00 (\$ \$0.00 (A	debtor	Pgs. 1-4	WILLIAM MORRIS AGENCY LLC	69242	Motors Liquidation Company	\$0.00 (S) \$0.00 (A)	
1 WILLIAM MORRIS PL		Corporation	\$0.00 (F	Claim	<del>,</del>	C/O PACHULSKI STANG ZIEHL & JONES LLP ATTN MR JASON POMERANTZ		Сопрапу	\$0.00 (A)	
BEVERLY HILLS, CA 90212			\$0.00 (U	J)		10100 SANTA MONICA BLVD, 11TH FLOOR LOS ANGELES, CA 90067			\$0.00 (U)	
Official Claim Date 11/25/2009			T)	Γ)		Official Claim Date 11/25/2009			(T)	
WILLIAM MORRIS AGENCY LLC	69240	MLC of Harlem,	\$0.00 (S	,	Pgs. 1-4	WILLIAM MORRIS AGENCY LLC	69242	Motors	\$0.00 (S)	
		Inc.	\$0.00 (A	debtor  Duplicate	;			Liquidation Company	\$0.00 (A)	
1 WILLIAM MORRIS PL			\$0.00 (I	Claim		C/O PACHULSKI STANG ZIEHL & JONES LLP ATTN MR JASON POMERANTZ 10100 SANTA MONICA BLVD, 11TH FLOOR			\$0.00 (P)	
BEVERLY HILLS, CA 90212			\$0.00 (U	J)		LOS ANGELES, CA 90067			\$0.00 (U)	
			Γ)	Γ)					(T)	
Official Claim Date 11/25/2009						Official Claim Date 11/25/2009				
WILLIAM MORRIS AGENCY LLC	69241	MLCS, LLC	\$0.00 (\$	S) Multi- debtor	Pgs. 1-4	WILLIAM MORRIS AGENCY LLC	69242	Motors Liquidation	\$0.00 (S)	
			\$0.00 (A	) Duplicate	;			Company	\$0.00 (A)	
C/O PACHULSKI STANG ZIEHL & JONES LLP ATTN MR JASON POMERANTZ			\$0.00 (I	Claim P)		C/O PACHULSKI STANG ZIEHL & JONES LLP ATTN MR JASON POMERANTZ			\$0.00 (P)	
10100 SANTA MONICA BLVD, 11TH FLOOR LOS ANGELES, CA 90067			\$0.00 (U	J)		10100 SANTA MONICA BLVD, 11TH FLOOR LOS ANGELES, CA 90067			\$0.00 (U)	
-,			Γ)	Γ)					(T)	
Official Claim Date 11/25/2009						Official Claim Date 11/25/2009				

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

<sup>(2)</sup> Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

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Exhibit A

120th Omnibus Objection

CLAIN	IS TO BE DISAL	LOWED AND	EXPUNGED		SURVIVING CLAIMS				
Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	Grounds For Objection Page Objection Reference	Name and Address of Claimant	Claim#	Debtor	Claim Amount and Priority (1)	
Claims to be Disallowed and	92	\$268,7	22.82 (S)						
Expunged Totals		:	<b>\$0.00</b> (A)						
		:	<b>\$0.00</b> (P)						
		\$600,451,8	<b>02.27</b> (U)						
		\$600,720,53	25.09 (T)						

<sup>(1)</sup> In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

09-50026-mg Doc 8209 Filed 12/21/10 Entered 12/21/10 20:56:54 Main Document HEARING DASTE AND HAVE: February 3, 2011 at 9:45 a.m. (Eastern Time) RESPONSE DEADLINE: January 27, 2011 at 4:00 p.m. (Eastern Time)

UNITED STATES BANKRUPTCY	COURT
SOUTHERN DISTRICT OF NEW Y	YORK

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In re : Chapter 11 Case No.

MOTORS LIQUIDATION COMPANY, et al., : 09-50026 (REG)

f/k/a General Motors Corp., et al.

Debtors. : (Jointly Administered)

· -----X

## ORDER GRANTING DEBTORS' 120<sup>TH</sup> OMNIBUS OBJECTION TO CLAIMS (Multi-Debtor Claims)

Upon the 120th omnibus objection to expunge certain claims, dated December 21, 2010 (the "120th Omnibus Objection to Claims"), of Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11, United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), seeking entry of an order disallowing and expunging, subject to confirmation of the Plan, the Multi-Debtor Claims, all as more fully described in the 120th Omnibus Objection to Claims; and due and proper notice of the 120th Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the 120th Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the

Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the 120th Omnibus Objection to Claims.

120th Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the 120th Omnibus Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on **Exhibit** "A" (the "Order Exhibit") annexed hereto under the heading "Claims to be Disallowed and Expunged" are disallowed and expunged from the claims registry; and it is further

ORDERED that, the Debtors may later object to any of the Surviving Claims on the basis that its holder failed to timely file a proof of such claim against at least one Debtor with respect to which the Surviving Claim would have been enforceable, by the applicable deadline set forth in the Bar Date Orders; it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim listed on Exhibit A annexed to the 120th Omnibus Objection to Claims under the heading "Claims to be Disallowed and Expunged" that is not disallowed or expunged pursuant to this Order; and it is further

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ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.
Dated: New York, New York

United States Bankruptcy Judge

\_\_\_\_\_, 2011